

FACT SHEET

INTENT TO REISSUE A HAZARDOUS WASTE MANAGEMENT POST-CLOSURE PERMIT

Facility Name: General Smelting and Refining, Inc.

Location: 8444 Horton Highway
College Grove, Williamson County, Tennessee 37046-0037

Installation ID Number: TND 00 404 8690

Facility Owner: Metalico, Inc.
186 North Avenue East
Cranford, New Jersey 07016

Facility Operator: Metalico-College Grove, Inc.
8430 Horton Highway
College Grove, Tennessee 37046

Facility Contact: Ms. Joyce Morales-Caramella
Environmental & Health Manager
Gulf Coast Recycling
1901 North 66th Street
Tampa, Florida 33619
Phone: (813) 626-6151

Comment Period: Begins: July 11, 2003
Ends: August 25, 2003

Public Hearing: 6:30 p.m., Monday, August 11, 2003
Artsitorium in College Grove at the
College Grove Senior Citizens Center
8607 Horton Highway
College Grove, Tennessee 37046

FACILITY DESCRIPTION

The facility property, which encompasses 48.62 acres, is occupied by both the former General Smelting and Refining, Inc. and the active secondary lead smelter, Metalico-College Grove, Inc. General Smelting and Refining, Inc. operated as a secondary lead smelter processing scrap metal and lead-bearing by-products into refined lead alloys. However, plant operations ceased in 1997, and the plant was demolished in 2000. No business activities are conducted at General Smelting and Refining, Inc. The active secondary lead smelter and associated operations at Metalico-College Grove, Inc. are regulated under a separate hazardous waste management facility permit, TNHW-081A.

The two regulated closed hazardous waste management units, Landfill #1 and Landfill #2, encompass approximately 8 acres. The wastes disposed in the landfills were obtained from the remediation of solid waste management units, SWMUs #2, #3, #4, #5, and #7, and impacted

soil underlying the former waste piles. Approximately 40,967 cubic yards was disposed in Landfill #1 and 397 cubic yards were disposed in Landfill #2. The closure certification was approved on August 17, 1990 for the landfills. Semi-annual groundwater sampling and analysis is conducted for antimony, cadmium, and lead to detect any impacts from the landfills. Inspections are also conducted to verify the integrity of the soil covers of the landfills, monitoring wells, and site security features.

PURPOSE

This fact sheet is prepared pursuant to Tennessee Rule 1200-1-11-.07(7)(d) for the draft permit developed by the Tennessee Department of Environment and Conservation's (TDEC) Division of Solid Waste Management (DSWM). The purpose of this permitting process is to afford any interested persons the opportunity to evaluate the ability of the permittee to apply the applicable hazardous waste management requirements. The proposal is for the renewal permit to be reissued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101, et. seq., and Tennessee Rule Chapter 1200-1-11, Hazardous Waste Management. The permit is prepared in accordance with the provisions of Tennessee Rule 1200-1-11-.07.

PERMIT HISTORY AND PROPOSED PERMIT

The current permit (TNHW-081) was issued to General Smelting and Refining, Inc. on September 30, 1992 and was effective for ten (10) years. Tennessee Hazardous Waste Management Regulations require that the facility submit the renewal application 180 days before the current permit expires. Metalico, Inc. submitted Part A and Part B hazardous waste permit renewal applications on March 29, 2002 to DSWM, thus, enabling the facility to continue post-closure care and monitoring under the current permit until a final decision is made. Metalico, Inc. held the pre-application meeting for the renewal application on March 25, 2002, as public noticed on February 24, 2002 in The Review Appeal. Several members of the community attended the public meeting.

The current permit requires the facility to perform post-closure care and monitoring of the two closed landfills. The permit also contains the conditions for continued corrective action activities for solid waste management units (SWMUs) and areas of concern (AOCs) at the facility. Metalico, Inc. shall be required to investigate any releases of hazardous waste or hazardous constituents pursuant to this permit at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. These corrective action conditions also require notification of imminent hazards, and when applicable, compliance with the requirements developed under the land disposal restrictions and organic air emission standards.

The proposed permit requires the continuance of post-closure care monitoring and maintenance of the two closed landfills and continued corrective action activities for SWMUs and AOCs. On August 15, 2000, Metalico, Inc. submitted the RCRA (Resource Conservation and Recovery Act) Facility Investigation (RFI) Work Plan for the investigation of SWMU #1. The RFI Work Plan was approved by the U.S. Environmental Protection Agency (EPA) and DSWM on October 17, 2000. A RFI investigation began in January 2001.

CORRECTIVE ACTION UNDER THE PREVIOUS AND PROPOSED PERMITS

Metalico, Inc. demolished the General Smelting and Refining, Inc. facility in 2000. The approved closure plan required the demolition and proper disposal of all the buildings and decontamination of the asphalt pad that the facility buildings occupied.

Metalico, Inc. has completed its RFI at the plant site and has fully delineated the extent of soil contamination at the closed General Smelting and Refining, Inc. facility. Also as part of the closure, SWMU #1, which encompasses the majority of the contaminated portion of the site, is covered by an asphalt cap where the worst contaminated soils, with lead levels that range as high as 50,000 to 60,000 parts per million (ppm), are located. There is some minor contamination, just above the EPA's approved action level of 1,550 ppm, outside the asphalt cap. Metalico, Inc. has completed about 60% of an evaluation to determine the final remedy. Contaminated soil from the other side of the Harpeth River will be removed and returned to the facility site for final disposal. Contaminated soil that exceeds the action level outside the asphalt cap will be consolidated and disposed of in a manner approved by DSWM.

During an EPA surface soil and sediment sampling study conducted by U.S. EPA Science and Ecosystem Support Division in July 1998, elevated levels of lead were detected on the banks of the Harpeth River and in the sediment to approximately one mile downstream. The soil contamination was intermittent and required instrumentation to locate. EPA determined that there was no risk associated with the contamination and required Metalico, Inc. to further sample the banks of the Harpeth River.

During the bank sampling Metalico, Inc. discovered lead contamination on the Haley Jaqueth Property (listed as AOC A) owned by the Wildlife Resources Agency of the State of Tennessee. Metalico, Inc. took 104 samples to delineate the extent of contamination. Upon completion of the property assessment Metalico, Inc. met with the Wildlife Resources Agency and developed a plan to stabilize the lead contamination. Metalico, Inc. submitted an Interim Measures Workplan on April 7, 2003 and upon approval implemented their plan for phytostabilization of the contaminated soils by planting native grasses at the site. Metalico, Inc. is now in discussion to resolve the final issue of fencing as part of its institutional controls.

SWMUs #2 through #7 were all incorporated into the two permitted RCRA Hazardous Waste Landfills that are located at the General Smelting and Refining, Inc. facility site.

COMMENTS

Copies of the facility's application, draft permit, fact sheet and public notice are available for public inspection at the Williamson County Public Library, 611 West Main Street, Franklin, Tennessee 37064 (telephone 615-794-3105). These materials are also available for public inspection during normal business hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays, at the TDEC Nashville Environmental Assistance Center, Public Access Area, 711 R.S. Gass Blvd., Nashville, Tennessee 37243 (telephone 615-687-7000); or at DSWM's Central Office, 5th Floor, L & C Tower, 401 Church Street, Nashville, Tennessee 37243-1535 (telephone 615-532-0780).

All persons, including the applicant, who believe that the tentative decision to reissue this permit is inappropriate must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by sending comments to Ms. Angela Ivory; Treatment, Storage and Disposal Section; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone 615-532-9267 or e-mail to Angela.Ivory@state.tn.us.

Comments will also be received at the public hearing on August 11, 2003. To assure consideration, comments must be received by 4:30 p.m., August 25, 2003.

When DSWM makes a final permit decision to either issue or deny the permit, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final decision. The final permit decision shall become effective upon signing by the Director of DSWM.

Persons who wish to be on DSWM's mailing list should request a Mailing List Request form by calling or writing: Public Participation Officer; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone 615-532-0798; or e-mail Solid.Waste@state.tn.us.

SWMU and AOC Status Table

SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Description	Former Permit Status	Proposed Permit Status	Rationale
1	Operators Area	This unit encompasses the paved areas where all former plant operations occurred; this unit managed lead-acid batteries and converted waste generated during lead recycling into reusable alloys.	RCRA Facility Investigation	RCRA Facility Investigation	Potentially Affected Media - Soil, Groundwater, and Surface Water
	Unloading Dock	Location #1			
	Slag Pile from Furnace	Location #2			
	Furnace Slag Storage Pile	Location #3			
	Smelter	Location #4			
	Slag Wall	Location #5			
	Storage Area for Baghouse Bags	Location #6			
	Sanitary Baghouse	Location #7			
	Storage Area for Baghouse Dust and Plates	Location #8			
	Drum Storage	Location #9			
	Drum Crusher	Location #10			
	Flue Dust Hopper	Location #11			
	Reverberatory Hopper	Location #12			
	Battery Storage Area	Location #13			
	Battery Cracking Unit	Location #14			
	Acid Storage Tank and Plastic Pile	Location #15			
	Dross Storage Tank	Location #22			
	Scrubber and Cooling Water Trough	Location #23			

**SWMU and AOC Status Table
(Continued)**

SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Description	Former Permit Status	Proposed Permit Status	Rationale
2	Smelter Slag Pile	This unit managed smelter slag from the refining process which contained antimony, cadmium, and lead.	No Further Action	No Further Action	This unit is regulated under the post-closure permit as Landfill #2.
3	Upper Lagoon	This unit contained wastewater generated by the battery cracking process. During remedial activities, the standing water was removed, and the remaining sludge was stabilized. The stabilized sludge and impacted soil underneath the lagoon were excavated and disposed in Landfill #1.	No Further Action	No Further Action	No releases are known to have occurred from this unit.
4	Lower Lagoon	This unit provided secondary containment of the process wastewater. During remedial activities, the standing water was removed, and the remaining sludge was stabilized. The stabilized sludge and impacted soil underneath the lagoon were excavated and disposed in Landfill #1.	No Further Action	No Further Action	No releases are known to have occurred from this unit.
5	Rubber Chip Pile	This unit was composed of battery casings from the cracking and reclamation of rubber-cased batteries. During remedial activities, all the waste and impacted soil beneath the unit was removed and disposed in Landfill #1.	No Further Action	No Further Action	No releases are known to have occurred from this unit.
6	Flue Dust Bag House	This unit served as particulate filters for the facility during operation and managed K069 flue dust. This unit has been incorporated into SWMU #1.	Confirmatory Sampling	RCRA Facility Investigation	Potentially Affected Media - Soil, Groundwater, and Surface Water

**SWMU and AOC Status Table
(Continued)**

SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Description	Former Permit Status	Proposed Permit Status	Rationale
7	Plastic Chip and Ash Pile	Plastic chips were managed at the unit until closure, when wastes from SWMUs #2, #3, #4, and #5, along with impacted soil and miscellaneous debris, were added to the unit. All wastes contain antimony, cadmium, and lead.	No Further Action	No Further Action	This unit is regulated under the post-closure permit as Landfill #1.
AOC A	Haley Jaqueth Property	19 acres of lead contaminated soils up to 4,000 ppm; contamination is spotty.	None	Interim Measures; will require Institutional Controls	Final Remedy is incomplete.